Dear Ms. Bui,

Lehigh is to be complimented on its efforts to meet the new NESHAP requirements ahead of the compliance date of September 9, 2013. Critically important to Lehigh's acceptance by the surrounding community is validation of Lehigh's compliance with all applicable laws and regulations, including NESHAP, through verifiable test data. Accordingly, the following clarifications/changes are recommended for incorporation into final Title V Permit:

- 1. The Continuous Air Emission Monitors (CEM) should measure total mercury occurring in any form (i.e., elemental mercury, methyl mercury, etc.) and should be installed at the new single stack prior to September 9, 2013;
- 2. Lehigh should install Total Hydrocarbon CEMS at both the new single stack kiln as well as at the existing raw mills prior to September 9, 2013.

Respectfully submitted,

Barbara

Barbara West